



## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

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### REMEDATION AND REDEVELOPMENT DIVISION

INTERNET: [www.michigan.gov/deqrrd](http://www.michigan.gov/deqrrd)

## INFORMATION BULLETIN #2

### CENTRAL CITY PARK Westland, Wayne County March 2007 (updated version)

#### INTRODUCTION

The purpose of this information bulletin is to inform area residents about the presence of lead contamination and the potential presence of additional contaminants at Central City Park (Park). This Information Bulletin is the second in a series provided by the Remediation and Redevelopment Division (RRD) of the Department of Environmental Quality (DEQ).

#### SITE OVERVIEW

Wayne County owns this property and used it to dispose of catch basin cleanings and street sweepings between the 1930s and 1970s. This debris is believed to contain lead from leaded gasoline used during that time. On December 10, 2006, photographs taken in 1971 came to light which document extensive illegal landfilling practices and the presence of numerous 55-gallons drums. Since the mid-1970s, the property has been leased by the city of Westland and operated as a public park.

DEQ-RRD first learned of the lead contamination at the Park on December 23, 2002, when a Remedial Action Plan (RAP) was submitted to the DEQ by Wayne County. In the RAP, the county proposed to excavate the lead contaminated soil above direct contact criteria, consolidate it, and place a cap of clean soil over the area. The RAP was insufficient – it incorrectly identified 1,500 parts per million (ppm) as the acceptable direct contact level for lead, and did not determine the extent of lead contamination, and was denied by the DEQ on May 7, 2003. (The current Michigan *residential direct contact criterion* for lead is 400 ppm; please see glossary for further explanation).

Since that time, the DEQ has been working with Wayne County and city of Westland officials to bring about an appropriate response to the conditions at

the Park. The DEQ has reviewed several workplans and provided sampling guidance to Wayne County.

The photographs revealed in December 2006, led the DEQ to require additional investigative activities be conducted at the Park to determine the nature and extent of any additional risks beyond the lead contamination.

#### CLARIFICATION OF KEY INFORMATION

The following key information clarifies important facts about this site:

- Lead is the only contaminant at the Park that has been documented thus far to exceed residential direct contact criteria and has been analyzed at each sample location. Other contaminants (cyanide, mercury, pesticides, and PCB's) which were discussed in past news articles as being present in the surface soil have been detected at only trace levels in the samples collected to date, well below residential direct contact criteria. However, these contaminants have not been analyzed for at each sample location.
- Two samples, from a small area west of the walking path in the woods, have been documented to exceed residential direct contact criteria for benzo(a)pyrene. Future investigation activities will further investigate the potential for benzo(a)pyrene to be present in additional areas of the Park.
- Arsenic, while present in some samples, is below the direct contact criteria of 16 ppm used for Wayne County. (Arsenic is known to be naturally occurring at this level in soils throughout Wayne County based on regional arsenic background data).
- Wayne County is responsible for the remediation of the property both as owner and as the party

that caused the contamination. The city of Westland as an operator of the property is obligated by state environmental law to protect the public from harmful exposures on the property ("Due Care" obligations).

- The current Michigan residential direct contact criterion for lead is 400 ppm. The direct contact criterion for lead at industrial or commercial properties is 900 ppm. The residential direct contact criterion for lead will be used in delineating the extent of contamination and used in determining future remedial activities.
- Fifteen samples were collected from the playscape area. One sample only (not two as reported) had lead above residential direct contact levels (695 ppm). Based on the samples (one out of fifteen), the DEQ does not consider this an exposure risk; however, additional investigation of the playscape area will be conducted.
- Contrary to recent reports, Wayne County has in fact submitted two remediation proposals (cleanup plans) to the DEQ:
  - The first cleanup plan was submitted in the RAP dated December 23, 2002, and was denied by the DEQ on May 7, 2003.
  - The second cleanup plan was submitted in writing on April 17, 2006. The DEQ responded on May 22, 2006, denying the proposal because the extent of lead contamination at the Park had not been adequately characterized.

## CURRENT STATUS/DEQ ACTIONS

To facilitate progress and to assist in addressing contamination at the Park, the DEQ is currently conducting geophysical evaluations of the Park. Based on the results of the geophysical investigation, the DEQ will conduct geoprobe borings and soil and groundwater samples will be collected and analyzed. Wayne County and the City of Westland have granted the DEQ access for the geophysical investigation and the geoprobe borings.

Following the geophysical investigation and review of the analytical results for the samples (soil and groundwater) collected from the geoprobe borings, the DEQ is recommending that limited test pits be conducted to properly identify any potential buried containers or materials. The DEQ has offered to conduct the test pits provided access is granted to

the DEQ by Wayne County and the City of Westland.

Once these activities are complete, the DEQ will provide the results of the investigation to Wayne County to assist Wayne County in identifying potential risks at the Park. Subsequently, Wayne County and city of Westland officials plan to identify an appropriate remedial action and to expedite implementation of the selected remedial action. Throughout this process, the DEQ will continue to provide oversight and guidance as the development and implementation of cleanup plans proceed.

## SCHEDULE

Geophysical investigation is presently being conducted by the DEQ at the Park and is expected to be complete by mid-March. Geoprobe borings are expected to be conducted by the DEQ in April/May 2007. Test pits are expected to be conducted by the DEQ in summer 2007.

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## GLOSSARY

**Residential Direct Contact Criteria:** Identifies a soil concentration that is protective against adverse health effects due to long-term ingestion of and dermal (skin) exposure to contaminated soil for residential land uses.

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